

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
DISASTER SITE LITIGATION

21 MC 100 (AKH)

THIS DOCUMENT RELATES TO ALL
CASES

**NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER COMPELLING CERTAIN
UNITED STATES SOCIAL SECURITY ADMINISTRATION OFFICES
TO RESPOND TO SUBPOENAS DUCES TECUM**

Upon the annexed certification of Wendell Y. Tong, an attorney, dated October 12, 2010 and the exhibits annexed thereto, Plaintiffs will move this Court, the Honorable Alvin K. Hellerstein, United States District Judge, presiding, Room 14D, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007 for an order, pursuant to Rule 45 of the Federal Rules of Civil Procedure: compelling certain local United States Social Security Administration offices to produce “[r]ecords of decision regarding Social Security Disability Insurance and all supporting documents, including: medical records, narrative reports, affidavits, notices of award, claims forms, disability determination, transmittal forms and internal memoranda,” pursuant to duly served subpoenas, and for such other and further relief as this Court deems just and proper.

Jurisdiction and venue are proper under the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 408(b)(3), which grants this Court exclusive jurisdiction over actions

brought on claims relating to or arising out of the events of September 11, 2001, and pursuant to the World Trade Center Settlement Process Agreement.

Dated: New York, New York
October 12, 2010

Respectfully submitted,

SULLIVAN PAPAIN BLOCK
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SOCIAL SECURITY ADMINISTRATION OFFICES:

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3247 Laconia Avenue
Bronx, New York 10469

Social Security Administration Office
3 Washington Center
Newburgh, New York 12550

Social Security Administration Office
4990 S. Clyde Morris Boulevard
Port Orange, Florida 32127

Social Security Administration Office
211 Station Road
Mineola, New York 11501

Social Security Administration Office
345 East 102nd Street
New York, New York 10029

Social Security Administration Office
411 W. Garden Street
Pensacola, Florida 32502

Social Security Administration Office
1380 Parker Street
Bronx, New York 10462

Social Security Administration Office
322 Main Street
Poughkeepsie, New York 12601

Social Security Administration Office
2389 Richmond Avenue
Staten Island, New York 10314

Social Security Administration Office
3386 Fulton Street
Brooklyn, New York 11208

Social Security Administration Office
75 Oak Street
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Social Security Administration Office
1380 Parker Street
Bronx, New York 10462

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